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10 [additional counsel listed in signature block]

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

13 _____)
14)
15 ECOLOGICAL RIGHTS)
FOUNDATION, a non-profit corporation)
16)
Plaintiff,) Case No. 4:24-cv-03665-HSG
17 v.)
18)
UNITED STATES ENVIRONMENTAL)
PROTECTION AGENCY, and)
MICHAEL S. REGAN, as Administrator)
of the United States Environmental)
Protection Agency,)
22 Defendants.

23)
24)
25)
26)
27)
28)
STIPULATION AND ORDER TO
CONTINUE LITIGATION DEADLINES
(as modified)

1 Plaintiff Ecological Rights Foundation and Defendants United States Environmental
2 Protection Agency (“EPA”) and Michael S. Regan, Administrator of the EPA (collectively, the
3 “Parties”) stipulate as follows:

4 1. The Parties have reached a tentative settlement that resolves all claims identified in
5 Plaintiff’s Notice of Intent and First Amended Complaint in this matter. *See* ECF 23.

6 2. In order to finalize the settlement, the Defendants are securing approval from senior-
7 level officials. The settlement is also subject to a 30-day public notice and comment period
8 consistent with EPA policy.

9 3. The Parties agree that a 21-day extension of all litigation deadlines is appropriate to
10 conserve resources and allow the parties the time necessary to finalize the settlement.

11 4. Per the Parties’ Stipulation filed August 23, 2024, ECF 18, and this Court’s September
12 3, 2024, Order, ECF 22, the Parties understand the current litigation deadlines to be as follows:

14 October 15, 2024 – Responsive Pleading Deadline

15 October 18, 2024 – Deadline to file ADR Certification

16 October 18, 2024 – Deadline to meet and confer re: initial disclosures, early
17 settlement, ADR process selection, and discovery plan

18 October 31, 2024 – Deadline to make initial disclosures

19 November 1, 2024 – Deadline to file Joint Case Management Statement

20 November 12, 2024 – Initial Case Management Conference

22 5. The Parties seek to continue all case management deadlines by 21 days with
23 accommodations as appropriate for weekends and holidays. The parties agree to amend the
24 deadlines as follows:

26 November 6, 2024 – Responsive Pleading Deadline

27 November 8, 2024 – Deadline to file ADR Certification

28 November 8, 2024 – Deadline to meet and confer re: initial disclosures, early

1 settlement, ADR process selection, and discovery plan
2 November 21, 2024 – Deadline to make initial disclosures
3 November 22, 2024 – Deadline to file Joint Case Management Statement
4 December 3, 2024 – Initial Case Management Conference

5

6 8. The Parties respectfully request that this Court enter this stipulation and extend all
7 litigation deadlines as outlined above.

8 9. The undersigned counsel for Defendants attest that the other signatories listed below
9 concur in the filing of this document.

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11 Dated: September 27, 2024

Respectfully submitted,

12
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